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January 31, 2017

Hon. Ajit Pai
Chairman
Hon. Mignon Clyburn
Commissioner
Hon. Michael O'Rielly
Commissioner
Federal Communications Commission
445 12th St. S.W.
Washington, D.C. 20554

Dear Mr. Chairman and Commissioners:

RE: Class A C4 Proposal (RM-11727)

A petition currently before the Commission would enable nearly 800 Class A FM stations to double their power from 6,000 watts to 12,000 watts, and allow hundreds of stations of all classes to improve their technical facilities without impacting the protected signal contours of neighboring stations. MMTC and SSR Communications, Inc. ("SSR") co-authored the proposal, which is before the Commission in RM-11727.

Under the current regulatory environment, many independent and minority-owned stations are and will be forever unable to upgrade their facilities, unless the Commission moves to adopt RM-11727's new FM C4 power classification. Still more stations will be locked into place by the Commission's current Section 73.215 regulations, which RM-11727 also seeks to alleviate. As many independent and minority-owned FM stations are of the Commission's lowest power classifications, approval of the RM-11727 proposal will enable a diverse array of broadcasters to compete more effectively.

When the Commission took formal comments on RM-11727, the proposal received near universally positive comments.

Consequently, MMTC respectfully requests that the Commission promptly issue an NPRM on RM-11727's FM Class C4 and Section 73.215 initiative.

Sincerely,

A handwritten signature in black ink, appearing to read "David Honig", is written over a light blue horizontal line.

David Honig
President Emeritus and Senior Advisor